1 THE HONORABLE THOMAS S. ZILLY 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 BUNGIE, INC., No. 2:21-cy-811-TSZ 10 Plaintiff, DECLARATION OF WILLIAM C. RAVA IN SUPPORT OF PLAINTIFF BUNGIE, 11 v. INC.'S MOTION TO STRIKE EXPERT 12 TESTIMONY OF BRAD LAPORTE AIMJUNKIES.COM; PHOENIX DIGITAL GROUP LLC; DAVID 13 SCHAEFER; JORDAN GREEN; JEFFREY CONWAY; and JAMES MAY, 14 Defendants. 15 16 I, William C. Rava, declare as follows: 17 I am an attorney licensed to practice law before the courts of the State of 18 Washington. I am a Partner at Perkins Coie LLP, and counsel in this action for Plaintiff Bungie, 19 Inc. ("Bungie" or "Plaintiff"). I submit this declaration in support of Plaintiff Bungie, Inc.'s 20 Motion to Strike Expert Testimony of Brad LaPorte. I have personal knowledge of the facts stated 21 herein and, if called upon, could and would testify competently thereto under oath. 22 2. Attached hereto as **Exhibit 1** is a true and correct copy of the June 12, 2023 Expert 23 Report of Scott Kraemer. 24 3. Attached hereto as Exhibit 2 is a true and correct copy of the August 28, 2023 25 Expert Report of Brad LaPorte. 26

RAVA DECL. ISO BUNGIE'S MOT. TO STRIKE LAPORTE TESTIMONY (No. 2:21-cv-811-TSZ) – 1

Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Phone: 206.359.8000 Fax: 206.359.9000

1	4. Attached hereto as Exhibit 3 are true and correct copies of excerpts from the
2	September 28, 2023 deposition of Brad LaPorte.
3	September 28, 2023 deposition of Brad Lar offe.
4	I declare under penalty of perjury under the laws of the United States that the foregoing is
5	true and correct.
6	true and correct.
7	Executed this 12th day of October, 2023.
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9	<u>/s/William C. Rava</u> William C. Rava
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